



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

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CHICAGO, IL 60604-3590

US EPA RECORDS CENTER REGION 5



472068

REPLY TO THE ATTENTION OF:

April 6, 1992

HSRW-6J

Ms. Liz Uhl  
WW Engineering & Science  
5555 Glenwood Hills Parkway, SE  
P.O. Box 874  
Grand Rapids, MI 49588-0874

Dear Liz,

This letter contains my comments on the Work Plan and Sampling Plan for the Albion-Sheridan Township Landfill site. I have also enclosed comments from other reviewers in Water Division, RCRA, Superfund's Technical Support Section, and the MDNR. While I believe it is important for you to see all the comments from various reviewers, I think we should meet and discuss those comments and then decide whether and how they should be addressed.

As you will see from their comments, the MDNR has several concerns relating to hot spot identification and characterization. I hope to meet with Gene Hall and his management as soon as possible to resolve these concerns and come up with an appropriate approach to this aspect of the investigation.

Based on our meeting March 19, 1992 for the municipal landfill pilot project, you are aware of most of the major revisions to the work plan and sampling plan that will be required. I will reiterate those here to some extent, as well as include other comments and/or questions that I have. The following are my comments:

**WORK PLAN**

- 1) p. 1-1, Section 1.1 -- Add a paragraph at the end of this section which identifies the site as a pilot project, and briefly discuss the municipal landfill guidance and its goals. There may be some language in the guidance document which we could use.
- 2) p. 1-3 -- The first two paragraphs each mention "borrow pits". Can this be better defined? I am not entirely certain what is meant here. Also, in the last sentence of para. 2: do we know the direction of surface water runoff at this point?
- 3) p. 1-4, 2nd full para. -- I believe that the private well in the southern portion of the site has been recently sampled. Maybe the Calhoun County Health Department has the results.

- 4) p. 1-5, para. 1 -- The results of the on-site groundwater sampling should be in the work plan. Also, I'm not sure the fourth sentence is accurate. Has the extent of any potential contaminant migration to nearby residential wells been monitored at all? Lastly, I believe that the Munier's well (last sentence) is used for drinking water, but they have been using bottled water because of the problems with their well. They still use it for showering. I can check on this.
- 5) p. 1-5, Section 1.1.3.4, para. 2 -- Do we know the year in which these numbers of well users were estimated? If so, please reference.
- 6) p. 1-7, Section 1.1.4, para. 3 -- In the last sentence, say "drums of paint sludges were dumped...."
- 7) p. 1.7, Section 1.1.5 -- Some of the bullets, such as the first, third and second to last ones, should be changed somewhat to address the streamlined approach. We can discuss appropriate changes and wording in our meeting.
- 8) p. 1-8, Section 1.1.6 -- Add landfill gas to the conceptual site model.
- 9) p. 1-9 -- Some discussion should be included here concerning the streamlined approach to the risk assessment. We can discuss what language would be appropriate.
- 10) p. 2-1, Section 2.2 -- I believe we decided that this section would be appropriate for further discussion of the purpose and goals of the municipal landfill guidance and our approach to this site. Also, in bullet #5, perhaps "quantify" should be changed to "assess" to give us a little more flexibility.
- 11) p. 2-7, Section 2.5.2 -- In the second paragraph, clarify that benchmarks will not be set on fill material. Also, at our 3/19 meeting we discussed the possibility of setting up monuments on the fill. Will we do this?
- 12) p. 2-8, Section 2.5.3 -- After "...perimeter.", add a sentence which says: "EPA will work with private property owners in affected areas to identify their concerns regarding fence placement and to determine how their concerns can best be addressed."
- 13) Section 2, General -- Reorder field investigation subtask sections so that they are in the order in which they are planned to occur in the field. The purpose and objectives for each aspect of the field investigation should be stated up-front and the appropriate "decision points" should be clearly stated.
- 14) p. 2-9, Section 2.5.6 -- Change the basis for determining the number of borings. I believe we are also no longer analyzing the cover for physical parameters, although the measurement of thickness and the lithologic description would be simple and would

provide some documentation of the cover characteristics.

15) p. 2-10, Section 2.5.7.1 -- In the first sentence, change "each" to "selected". A basis for what soil samples would be collected should also be provided.

16) p. 2-10 - 2-11, Section 2.5.7.3 -- Clarify approach to installation and sampling of monitoring wells, including the "decision points", when we will discuss options for potential locations and numbers of additional wells. Also, it should be clear that EPA will provide final direction on the numbers and locations of wells. Question: does the MDNR's comment concerning the slightly different groundwater flow directions in the bedrock and glacial aquifers change the strategy for installation of wells?

17) p. 2-13, Section 2.5.10 -- We need to change the strategy for surface soil sample collection somewhat. Add language such as: "If it is determined to be necessary for the purposes of a quantitative Risk Assessment...." We will also want to consider sampling off-site surface soils in areas where no cap may be placed to determine whether the surface soil pathway will be adequately addressed by the cap and to make some decisions concerning the relative costs of extending the cap over contaminated surface soil vs. consolidating soils under the cap.

18) p. 2-14, Section 2.5.12 -- Again, this is another place where we could use the language: "...for the purposes of a quantitative Risk Assessment...."

19) p. 2-17, Section 2.9 -- Some revision to the Baseline Risk Assessment approach will need to be made based on the streamlining concept. Potential language: "The Risk Assessment will be streamlined to the extent possible. This approach may include a limited quantitative assessment to determine whether the threshold to take an action has been exceeded, as well as a qualitative assessment to look at other potential exposure pathways. The final form of the Risk Assessment will largely depend on the results of the sample collection and analysis." Also, I think listing the Municipal Landfill Guidance as a reference for the Risk Assessment may help.

20) p. 2-20, Section 2.11, para. 1 -- At the end of the first paragraph, add "...assuming Michigan Act 307 is identified as an ARAR." (Spell out ARAR if it hasn't been used yet.)

21) p. 2-21, Section 2.11 -- Delete the last sentence of the paragraph which continues from 2-20. ("This approach...")

22) p. 2-21, Section 2.11, first bullet -- Delete "for Act 307 uses" and replace with "to determine whether certain standards in Act 307 are being met or not."

23) p. 3-3, Section 3.3.1.2 -- In this section, I would like to see something more specific concerning the Municipal Landfill Guidance (MLG). The first two paragraphs plus the first two sentences of the third are fine. After that, rather than the bulleted items, add some discussion along the lines of pp. 4-1 and 4-2 of the MLG. For instance, "Alternatives will be developed in light of the NCP expectations, which are as follows: (see p. 4-1)...." and then "In the effort to streamline the process per the MLG, the following points and assumptions should be considered while developing remedial action alternatives: (see p. 4-2)...." Do mention that a no action alternative will also be carried through the development and screening.

24) p. 3-4, Section 3.3.1.3, para. 2 -- In the first sentence, delete "contribute substantially....or" and say "protect human health and". Delete the last sentence and add the following sentence: "Other measures of effectiveness are the degree to which an alternative reduces toxicity, mobility, or volume through treatment, minimizes residual risks and affords long-term protection, complies with ARARs, minimizes short-term impacts, and how quickly it achieves protection."

25) p. 3-4, Section 3.3.1.3, para. 3 -- After "implement" add "either technically or administratively". Delete "will not....technology" and add "require equipment, specialists or facilities that are not available within a reasonable period of time".

26) p. 3-6, Section 3.3.2.1 -- "Overall Protection of Human Health and the Environment" should be first. Add "through treatment" to "reduction of toxicity, mobility or volume." Under the ARAR Compliance subsection, delete "in view of" and add "to determine whether it attains". For the heading Long-term Effectiveness add "and Permanence" rather than "Performance Evaluation".

27) p. 3-7 -- Again, add "through treatment" to "reduction of toxicity, mobility or volume." Delete the sentences under that subsection and add: "This criterion assesses the degree to which alternatives employ recycling or treatment that reduces the toxicity, mobility or volume of waste and/or contaminants."

In the heading "Short-Term Effectiveness" delete "Evaluation". In that subsection, delete the second "effectiveness" in the first sentence and add "short-term impacts". Add a sentence which states: "The assessment includes short-term risks which may be posed to the community, the workers and the environment during remedial action, the effectiveness and reliability of protective measures, and the amount of time until protection will be achieved." Delete bulleted items.

Under Implementability, delete "Relation to" in the second bullet and replace with "Ease of undertaking". In the last paragraph on

the page, delete "the likelihood...project" and add: "activities needed to coordinated with other offices and agencies and the ability and time required to obtain any necessary approvals and permits for off-site actions..."

28) p. 3-8 -- Delete the last bullet under "Cost". Under "State Acceptance", delete current language and say: "The technical or administrative issues and concerns the State may have regarding each alternative will be addressed." Under "Community Acceptance," change "address" to "evaluate", and add a sentence which states: "This criterion will be addressed in the Responsiveness Summary, after receipt of comments during the public comment period."


29) p. 3-10 -- Delete this paragraph. A Final FS after the public comment period is generally not prepared. Also, where is Task 12, Post RI/FS Support? Please add.

30) Figure 3 -- Parcels D & E are now owned by the same person. Combine into one parcel.

31) General -- I am not going to provide detailed comments on the Sampling and Analysis Plan since this will change as the Work Plan is revised. The purpose and objectives for each type of sampling and analysis should be summarized up-front in each section of the SAP. I would like to discuss the objectives and "decision points" at our next meeting to ensure that everyone is in agreement and understands the approach. I would also like to go over the rationale for proposed sampling locations. I am not going to comment on those presented here since I imagine they are changing. One specific comment: In the SAP, please identify whether groundwater samples are going to be filtered or unfiltered and, if filtered, what size the filter will be. For surface water samples, identify the size of the filter and the method.

Since your schedule allows three weeks for WW's revision of the work plan, I think we should have our meeting as soon as possible; probably the beginning of the week of April 13th would be best. Let me know what would be good for you. Please call me if you have any questions.

Sincerely,



Mary Beth Novy  
Remedial Project Manager

cc: Pat Vogtman  
Gene Hall  
Mary Pat Tyson